

DOCKET NO.: NNH-CV17-6072389-S	:	SUPERIOR COURT
	:	
ELIYAHU MIRLIS	:	J. D. OF NEW HAVEN
	:	
v.	:	AT NEW HAVEN
	:	
YESHIVA OF NEW HAVEN, INC.	:	MARCH 1, 2018
FKA THE GAN, INC. FKA THE GAN	:	
SCHOOL, TIKVAH HIGH SCHOOL AND	:	
YESHIVA OF NEW HAVEN, INC.	:	

MOTION FOR ACCESS TO PREMISES FOR APPRAISAL

The plaintiff in the above entitled action, Eliyahu Mirlis (“Plaintiff”), respectfully represents that he has sought, through his counsel, to obtain an appraisal of the real property known as 765 Elm Street, New Haven, Connecticut (the “Property”), which is the subject of this foreclosure action. Despite numerous requests, the defendant, Yeshiva of New Haven, Inc. f/k/a the Gan, Inc. f/k/a the Gan School, Tikvah High School and Yeshiva of New Haven, Inc. (“Defendant”), has not provided access to the Property so that Plaintiff can conduct his appraisal. Inspection of the Property is necessary to determine the fair market value of the Property.

WHEREFORE, Plaintiff respectfully moves that Defendant be Ordered to grant access to Plaintiffs’ appraiser at reasonable times upon reasonable notice for purposes of inspecting the whole Property for purposes of an appraisal within ten (10) days of the granting of this motion. Reasonable times shall include, but are not limited to, 9:00 a.m. through 5:00 p.m., with other times by agreement of the parties. Reasonable notice shall include email or voice mail notice to Defendant’s counsel twenty-four (24) or more hours prior to the identified time and day the inspection is to occur. The inspection time window given in the notice shall be 2 hours. Inspection may include the taking of photographs, and access shall be available to all parts of the Property.

ORAL ARGUMENT NOT REQUESTED
TESTIMONY NOT REQUIRED

THE PLAINTIFF
ELIYAHU MIRLIS

By: /s/ John L. Cesaroni
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CERTIFICATE OF SERVICE

This is to certify that today a copy of the foregoing Motion for Access to Premises for Appraisal was sent to all appearing parties and counsel of record as follows via electronic mail:

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/s/ John L. Cesaroni
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